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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

No. 2:18cv530

CSX TRANSPORTATION, INC.,  
individually and on behalf  
of NORFOLK & PORTSMOUTH BELT  
LINE RAILROAD COMPANY,  
Plaintiff,

v.  
NORFOLK SOUTHERN RAILWAY COMPANY,  
et al.,

Defendants.

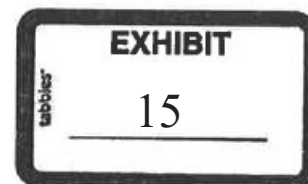
Remote Proceedings

January 13, 2021

9:38 a.m. - 6:40 p.m.

VIDEO DEPOSITION OF ROBERT GIRARDOT  
(via Teleconference)

Taken before SUZANNE VITALE, R.P.R., F.P.R.  
and Notary Public for the State of Florida at Large,  
pursuant to Notice of Taking Deposition filed in the  
above cause.



Job No. CS4395739

1 monitor is 3:02 p.m. We are back on the video  
2 record. This is the start of Media Unit No. 4.

3 BY MR. WINGFIELD:

4 Q. Mr. Girardot, we're on Exhibit 14, which  
5 is tab 16, Cannon Moss' e-mail, still.



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10 Do you see that?

11 A. Yes.

12 Q. Did CSXT understand it was being offered a  
13 rate committee to consider the proposed rate if it  
14 wanted?

15 A. No, I don't understand that bullet as  
16 that, no.

17 Q. Okay. Did CSXT at any point say yes,  
18 thank you, we would like the rate committee?

19 A. Not that I know of.

20 Q. So let's go back to the 2018 rate  
21 proposal, Exhibit 12, tab 7.

22 A. Yes.

23 Q. I'm on page 2, the language we looked at  
24 before, where CSXT, in this letter, stated

25 "Similarly, we believe the commercial sensitivity

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15 Q. How much revenue traffic did Norfolk &  
16 Portsmouth Belt Line carry for CSXT to or from NIT  
17 prior to the removal of the diamond in 2008?

18 A. Are you talking about international  
19 containers?

20 Q. Yes, just focus on international  
21 intermodal.

22 A. For CSXT? I would say that they didn't  
23 move any. But it's really not about what we moved.  
24 It was what -- I mean, there's a lot of public  
25 information about how big NIT was going to be and